

(1) Applicants' invention as recited in amended claim 1 requires "means for generating estimate data representing a relationship between the information data and an estimated number of said at least one respective end user device," support for which can be found on page 8, line 20 to page 9, line 3 of the specification. Although Hamaguchi describes previously selecting and receiving programs having a high audience rating at a subscriber accommodation node (col. 17, lines 25-26 of Hamaguchi), and installing two or more image information storage units for storing the same image information to accommodate multiple subscribers requesting the same image information (col. 28, lines 6-9 of Hamaguchi), it does not appear to teach or suggest "generating estimate data representing a relationship between the information data and an estimated number of said at least one respective end user device," as recited by amended claim 1. Voeten and Awaji also do not appear to teach or suggest this limitation. Therefore, it is respectfully submitted that amended claim 1, together with claims 2-16 and 21-26 dependent therefrom, is patentable over the applied references.

(2) New claim 30 incorporates the limitation "wherein at least one storage medium unit includes a controller for selecting a play mode of the selected information data stored in a respective storage medium unit in accordance with said distribution control data wherein said controller selects scenes to form a mosaic of scenes." The applied references Voeten, Hamaguchi, and Awaji do not appear to teach or suggest this inventive feature, an illustrative embodiment of which is disclosed on page 20, line 33 to page 21, line 8 of the specification. It is, thus, respectfully submitted that claim 30, along with claims 19 and 20 dependent therefrom, are patentable over the applied references.

(3) Applicants have added independent claim 27 to recite the inventive feature of "detecting malfunctions of said one or more storage medium units and outputting malfunction


data representing detected malfunctions,” support for which can be found on page 9, lines 4-13 of the specification. None of the applied references appear to teach or even suggest this feature. Accordingly, applicants submit that claim 27, together with claims 28 and 29 dependent therefrom, is patentable over Voeten, Hamaguchi, and Awaji.

The Examiner has made of record, but not applied, several additional references. Applicants appreciate the Examiner’s implicit finding that these references, whether considered alone or in combination with others, do not render the claims of the present application unpatentable.

Statements appearing above in respect to the disclosures in the cited references represent the present opinions of the undersigned attorney and, in the event that the Examiner disagrees with any of such opinions, it is respectfully requested that the Examiner specifically indicate those portions of the respective reference providing the basis for a contrary view.

It is respectfully submitted that all pending claims are in condition for allowance. Accordingly, favorable reconsideration of this case and early issuance of a Notice of Allowance are respectfully requested.

Respectfully submitted,
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